UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

FEDERAL INSURANCE COMPANY a/s/o AAA MID-ATLANTIC, INC., Plaintiff, v. **AMERICAN HOME ASSURANCE COMPANY And NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA.** Defendants.	Civil Action No. 1:07-cv-6422-VM **MOTION TO ADMIT COUNSEL PRO HAC VICE**

PURSUANT TO RULE 1.3 (c) of the Local rules of the United States District Court for the Southern and Eastern Districts of New York, I, Lisa C. Wood, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

Applicant's Name: Michael H. Cohen
Firm Name: Schwartz Simon Edelstein Celso & Kessler
Address: 44 Whippany Road, Suite 200
City/State/Zip: Morristown, NJ 07962-2355
Phone Number: (973) 301-0001
Fax Number: (973) 993-3152

MICHAEL H. COHEN is a member in good standing of the Bar of the State of New Jersey and the United States District Court for the District of New Jersey. There are no pending disciplinary proceeding against MICHAEL H. COHEN in any State or Federal Court.

Dated: Morristown, New Jersey
August 27, 2007

Respectfully submitted,

[signature]

Lisa C. Wood (LW-2628)
Schwartz Simon Edelstein Celso & Kessler, LLC
845 Third Avenue, 17th Floor
New York, New York 10022
Phone: (212) 752-5258
Fax: (973) 993-3152

TO: Judith Goodman, Esq.
Goodman & Jacobs LLP
Attorneys for Plaintiff
75 Broad Street
New York, New York 10004
Phone: (212) 385-1191
Fax: (212) 385-1770

AFFIDAVIT OF SERVICE

STATE OF NEW JERSEY)
s.s.:
COUNTY OF MORRIS)

I, Gregory Dennison, am over the age of 18 years, am not a party to this action, and reside in the County of Morris, State of New Jersey.

On August 27, 2007, I caused with the within Motion to Admit Counsel Pro Hac Vice, Affidavit of Lisa C. Wood, Affidavit of Michael H. Cohen, and proposed form of Order, to be served via FedEx to:

Judith Goodman, Esq.
Goodman & Jacobs LLP
75 Broad Street
New York, New York 10004

Gregory Dennison

Sworn to before me
this 27th day of August, 2007

David M. Farkouh
Attorney-at-Law, State of New Jersey

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

FEDERAL INSURANCE COMPANY a/s/o AAA MID-ATLANTIC, INC., Plaintiff, v. **AMERICAN HOME ASSURANCE COMPANY And NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA.** Defendants.	Civil Action No. 1:07-cv-6422-VM **AFFIDAVIT OF LISA C. WOOD, ESQ.**

LISA C. WOOD, being duly sworn, deposes and says:

1. I am an attorney at law of the State of New Jersey and a Counsel of the law firm of Schwartz Simon Edelstein Celso & Kessler, LLC, attorneys for defendants American Home Assurance Company ("American Home") and National Union Fire Insurance Company of Pittsburgh, PA ("National Union") in the above-captioned matter.

2. I submit this affidavit in support of American Home's and National Union's application for the admission pro hac vice of Michael H. Cohen, Esq., a member of my firm.

3. Mr. Cohen's accompanying affidavit sets forth his qualifications and demonstrates that he is a member in good standing of the Bars of the District of New Jersey and the State of New Jersey. Mr. Cohen also is a member in good standing of the United States Supreme Court.

4. Mr. Cohen has represented American Home and National Union in numerous matters, including a prior action venued in the Southern District of New York and many actions

in the State and Federal Courts in New Jersey. As a result, he has established relationships with these entities and can properly act on their behalf in this matter.

5. Additionally, American Home and National Union have requested that Mr. Cohen represent them in connection with this matter.

6. I will remain involved in this matter and will assist Mr. Cohen in the handling of the litigation.

LISA C. WOOD (LW-2628)

Sworn to before me this
21st day of August, 2007

Gregory Dennison, Esq.
Attorney-at-Law, State of New Jersey

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

FEDERAL INSURANCE COMPANY a/s/o AAA MID-ATLANTIC, INC., Plaintiff, v. **AMERICAN HOME ASSURANCE COMPANY And NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA.** Defendants.	Civil Action No. 1:07-cv-6422-VM **AFFIDAVIT OF MICHAEL H. COHEN, ESQ.**

MICHAEL H. COHEN, being duly sworn, deposes and says:

1. I am an attorney at law in the State of New Jersey and I am a member of the law firm of Schwartz Simon Edelstein Celso & Kessler LLC, attorneys for defendants American Home Assurance Company ("American Home") and National Union Fire Insurance Company of Pittsburgh, PA ("National Union") in the above-captioned matter. I submit the within Affidavit in support of this application for admission pro hac vice.

2. I was admitted to practice law in the State of New Jersey in 1988. I am currently a member in good standing. A true and correct copy of a Certificate of Good Standing from the State of New Jersey is attached hereto as Exhibit A.

3. I was admitted to practice law in the United States District Court for the District of New Jersey in 1988. I am currently a member in good standing. A true and correct copy of the Certificate of Good Standing from the United States District Court for the District of New Jersey is attached hereto as Exhibit B.

4. I was admitted to practice law in the United States Supreme Court in August, 1996. I am currently a member in good standing.

5. I have never been disbarred, suspended, or denied admission to practice law in any jurisdiction.

6. I am familiar with the Code of Professional Responsibility, the Federal Rules of Civil Procedure the Federal Rules of Evidence and the Local Rules of this Court, and I understand that I shall be subject to the disciplinary jurisdiction of this Court.

7. I understand that this admission pro hac vice is for this case only and does not constitute formal admission to the bar of this Court.

8. If admitted, I will work on American Home and National Union's behalf with a Counsel of my firm, Lisa C. Wood, who is a member of this Court.

9. I have spoken with my adversary, Judith Goodman, Esq., regarding the instant application, and Ms. Goodman represented to me that she consents to my admission pro hac vice with respect to this action. A copy of my letter to Ms. Goodman confirming same is annexed hereto as Exhibit C.

MICHAEL H. COHEN (MC-8549)

Sworn to before me this
21st day of August, 2007

Gregory Dennison, Esq.
Attorney-at-Law, State of New Jersey

Supreme Court of New Jersey

Certificate of Good Standing

This is to certify that **MICHAEL HERBERT COHEN** (No. **035391988**) was constituted and appointed an Attorney at Law of New Jersey on **December 19, 1988** and, as such, has been admitted to practice before the Supreme Court and all other courts of this State as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.

Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.

In testimony whereof, I have hereunto set my hand and affixed the Seal of the Supreme Court, at Trenton, this **3RD** day of **August** , 20 **07**

Clerk of the Supreme Court

-453a-

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

DISTRICT OF NEW JERSEY

I, WILLIAM T. WALSH, Clerk of the United States District Court for the District of New Jersey,

DO HEREBY CERTIFY THAT **MICHAEL HERBERT COHEN was** duly admitted to practice in said Court on **DECEMBER 19, 1988** and is in good standing as a member of the bar of said Court.

Dated at Trenton, New Jersey

WILLIAM T. WALSH
Clerk

on August 2, 2007

By Deborah A. Amato
Deputy Clerk

U.S. District Court for the District of New Jersey does not entertain a grievance committee. Contact Board of Bar Examiners New Jersey State Supreme Court.

SSEC&K
ATTORNEYS-AT-LAW

SCHWARTZ SIMON EDELSTEIN CELSO & KESSLER LLC

TEN JAMES STREET • FLORHAM PARK • NEW JERSEY 07932 TEL: 973.301.0001 FAX: 973.301.0203

Please Reply to Florham Park Office. WWW.SSECK.COM

August 15, 2007

VIA ELECTRONIC
AND REGULAR MAIL
Judith Goodman, Esq.
GOODMAN & JACOBS, LLP
75 Broad Street – 30th Fl.
New York, NY 10004

Re: Federal Insurance Co. v. American Home Assurance Co., et al.
Civil Action No. 1:07-cv-6422-VM
Our File No. AGMCL073

Dear Judi:

This letter will confirm our agreement that our respective clients, by and through their counsel, consent to the *pro hac vice* admissions in the above action of Steven W. Usdin, Esq. for Federal Insurance Company, and the undersigned for American Home Assurance Company.

Thank you for your continuing courtesies.

Very truly yours,

MICHAEL H. COHEN
mcohen@sseck.com

cc: Steven W. Usdin, Esq. (via electronic mail)

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

FEDERAL INSURANCE COMPANY a/s/o AAA MID-ATLANTIC, INC., Plaintiff, v. **AMERICAN HOME ASSURANCE COMPANY And NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA.** Defendants.	:	Civil Action No. 1:07-cv-6422-VM **ORDER**

This matter having come before the Court upon the application of Schwartz Simon Edelstein Celso & Kessler, counsel for defendants American Home Assurance Company ("American Home") and National Union Fire Insurance Company of Pittsburgh, PA ("National Union"), on notice to Judith Goodman, Esq., counsel for plaintiff Federal Insurance Company a/s/o AAA Mid-Atlantic, Inc., and the Court having considered the papers submitted by the parties and the arguments of counsel, and good cause having been shown for the entry of the within Order;

It is on this ________ day of ___________________, 2007;

ORDERED that Michael H. Cohen is admitted pro hac vice on behalf of American Home and National Union; and it is further

ORDERED that a copy of this Order shall be served upon all counsel of record within _____ days hereof.

____

Opposed _____

Unopposed _____